

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: Kenneth L. Harpster aka Ken L Harpster and Melissa R. Harpster	Chapter: 13
	Bankruptcy No.: 22-70367-JAD
Debtors	11 U.S.C. § 362

Wilmington Savings Fund Society, FSB, d/b/a  
Christiana Trust as Trustee for PNPMS Trust III

Movant

vs.

Kenneth L. Harpster aka Ken L Harpster and  
Melissa R. Harpster

Debtors

and

Ronda J. Winnecur, Esquire

RESPONDENTS

**PRAECIPE TO WITHDRAW OBJECTION OF WILMINGTON SAVINGS FUND SOCIETY,  
FSB, D/B/A CHRISTIANA TRUST AS TRUSTEE FOR PNPMS TRUST III, TO  
CONFIRMATION OF DEBTORS` PROPOSED CHAPTER 13 PLAN**

**TO THE CLERK OF THE UNITED STATES BANKRUPTCY COURT, WESTERN DISTRICT  
OF PENNSYLVANIA**

Kindly withdraw the Objection to Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust as Trustee for PNPMS Trust III, to Confirmation of Debtors` Proposed Chapter 13 Plan in the above captioned matter.

Respectfully submitted,

/s/ Michael Clark

Richard M. Squire, Esq. (PA I.D. # 04267)

M. Troy Freedman, Esq. (PA I.D. # 85165)

Michael J. Clark, Esq. (PA I.D. # 202929)

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Attorney for Movant

Dated: May 3, 2023

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Debtors

and

Ronda J. Winnecour, Esquire

Trustee

**RESPONDENTS**

**CERTIFICATE OF SERVICE**

I hereby certify that I am over 18 years of age; and that service upon all interested parties, indicated below, was made by sending true and correct copies of the Praeclipe to Withdraw Objection of Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust as Trustee for PNPMS Trust III, to Confirmation of Debtors' Proposed Chapter 13 Plan electronically and/or via First Class Mail, postage prepaid.

Date Served: 05/03/2023

Ronda J. Winnecour, Esquire  
Chapter 13 Trustee  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219

United States Trustee  
Office of the United States Trustee  
Liberty Center  
1001 Liberty Avenue, Suite 970  
Pittsburgh, PA 15222

Kenneth L. Harpster  
1706 Adams Avenue  
Tyrone, PA 16686

Melissa R. Harpster  
1706 Adams Avenue  
Tyrone, PA 16686

Kenneth P. Seitz  
Law Offices of Kenny P. Seitz  
P.O. Box 211  
Ligonier, PA 15658

I hereby certify the foregoing to be true and correct under penalty of perjury.

Respectfully submitted,

/s/ Michael Clark  
Richard M. Squire, Esq. (PA I.D. # 04267)  
M. Troy Freedman, Esq. (PA I.D. # 85165)  
Michael J. Clark, Esq. (PA I.D. # 202929)  
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Attorney for Movant